From:	Walls (Young), Suzy
To:	Mitchell, Tanya; Sivak, Michael
Cc:	Persico, John; Gutherz, Andrew
Subject:	RE: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164
Date:	Tuesday, January 20, 2015 12:20:14 PM
Attachments:	Rolling Knolls Soil Sample Collection_FCR 4.docx

Tanya,
Please find attached FCR-04 regarding the change in sample matrix from soil to sediment.
In regards to your question below, the water feature you mention near SS-163 was not a defined channel. The field crew went to the proposed location and found that the entire area was under water. The specific location selected for SS-163 had slightly deeper water than adjacent areas (approximately 1.5-2 ft) but the adjacent areas also had a significant amount of standing water and was also considered sediment. There was no soil within approximately 200 feet of this proposed location.
Also, as stated in the attached FCR, there is enough sample volume to analyze for PCB congeners, dioxins, and furans at each of these three locations.
Thanks,
Suzy

From: Mitchell, Tanya [mailto:Mitchell.Tanya@epa.gov]
Sent: Thursday, January 15, 2015 11:50 AM
To: Walls (Young), Suzy
Cc: Sivak, Michael
Subject: RE: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Suzy,
After review of the supporting documentation, and location of the samples, it is EPA's determination that a field change request was warranted. Please submit a FCR indicating the field conditions that required a change in sample matrix from soil to sediment. Also, include additional detail regarding the proximity for sample location SS-163, as it was adjacent to a channel.
In addition, please reply if enough sample volume was collected to analyze for congeners, dioxins, and furans if PCBs are detected in the TAL analysis.
In the future should a similar situation arise in the field, please do not hesitate to contact EPA for guidance.
Regards,
Tanya

From: Walls (Young), Suzy [mailto:Suzy.Walls@arcadis-us.com]
Sent: Wednesday, January 14, 2015 4:45 PM
To: Mitchell, Tanya; Sivak, Michael
Cc: Persico, John; Gutherz, Andrew
Subject: RE: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Tanya,
FCR-03 added the use of direct push Lexan tubing in saturated soil conditions. This is the method that was used to collect the samples listed below. Lexan tubing is also an approved sediment sampling method in SOP-14 in the QAPP. I have attached a copy of the COC and the field logbook notes. If you would also like to see the sample login acknowledgment from the laboratory, I can send you that as well.
Thanks,
Suzy

From: Mitchell, Tanya [mailto:Mitchell.Tanya@epa.gov]
Sent: Wednesday, January 14, 2015 3:37 PM
To: Walls (Young), Suzy
Cc: Sivak, Michael
Subject: FW: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Suzy,
In addition to the following, please include a copy of the field logbook and the sample chain of custody associated with the samples in question.
Thanks,
Tanya

From: Mitchell, Tanya
Sent: Wednesday, January 14, 2015 3:29 PM
To: Walls (Young), Suzy
Cc: Sivak, Michael
Subject: RE: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Suzy,
I have reviewed FCR-03 and I do not see how this FCR applies to this situation. Since EPA did not have oversight of the collection of these samples, please provide a detailed description of how the samples were collected along with what analyses were requested.
Regards,
Tanya

From: Walls (Young), Suzy [mailto:Suzy.Walls@arcadis-us.com]
Sent: Wednesday, January 14, 2015 3:06 PM
To: Mitchell, Tanya; Sivak, Michael
Cc: Persico, John; Gutherz, Andrew
Subject: RE: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Tanya,
When USEPA requested these particular locations, there was no guarantee that they would be located in areas that had surface soil (rather than sediment). Consequently, we did not feel that the locations should be moved to surface soil locations and so the field crew went back to the locations proposed in the SAP and collected these three samples last week. Given the conditions that the crew members encountered, they felt that these locations may be more appropriate as sediment samples and used the sampling protocol approved in FCR-03, which was specifically for inundated soils. When the samples were sent to the laboratory, we requested pH, grainsize, and TOC analyses (parameters that are typically requested for sediment samples) in addition to the soil parameters that were listed in the SAP.
John and I did not feel this required a field change notice because we were not implementing a change to the SAP. Please let me know if you have any other questions.
Thanks,
Suzy

From: Mitchell, Tanya [mailto:Mitchell.Tanya@epa.gov]
Sent: Wednesday, January 14, 2015 1:52 PM
To: Walls (Young), Suzy
Cc: Sivak, Michael
Subject: Rolling Knolls SAP for Samples SS-162, SS-163 and SS-164

Suzy,
EPA was notified that there were some sampling concerns and discussion associated with the locations of samples SS-162, SS-163 and SS-164. EPA's oversight personnel has reported the following:
"On January 6 and 7 ARCADIS performed recon for soil sampling locations SS-162, SS-163 and SS-164.
However, due to each location being inundated with water (ranging from 1.5' to 3' of water) and the type of vegetation growing within the vicinity, ARCADIS field staff determined that it would be more accurate to characterize all 3 sampling points consisting of sediment rather than soil.
Due to this determination, samples were not collected from any of the three locations. ARCADIS is evaluating their options and if they are going to propose alternate locations via a

field change request and thus will need to get approval to either move the locations to a more upland area consisting of soil or collect these three points as sediment.

It is important to note that only location SS-164 had an upland area consisting of soil within close proximity of approximately 40 feet. Locations SS-164 and SS-165 were several hundred feet away from any upland areas showing soil characteristics."

Please provide a detailed response regarding the collection of samples SS-162, SS-163 and SS-164. As previously discussed, changes to the approved SAP must be approved by EPA prior to implementing a change.

Regards,

Tanya